

**TABLE 1. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING
REQUIREMENTS FOR STEEL PICKLING NESHAQ, SUBPART CCC**

Burden item	Notes	(A) Person- hours per occurrence	(B) Number of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) ^a Cost,\$
1. Applications		N/A							
2. Survey and Studies		N/A							
3. Reporting Requirements									
A. Read instructions	b	4	1	4	0.3	1.20	0.06	0.12	\$75.44
B. Required activities									
Initial performance test	b	125	1	125	0.3	37.50	1.88	3.75	\$2,357.79
Repeat performance test	d	125	1	125	0	0.00	0.00	0.00	\$0.00
Annual performance test	c	125	1	125	71	8875.00	443.75	887.50	\$557,918.00
Startup, shutdown, malfunction plan	b	40	1	40	0.3	12.00	0.60	1.20	\$754.37
Maintenance plan	b	40	1	40	0.3	12.00	0.60	1.20	\$754.37
Maintenance plan revision	f	40	1	40	7.1	284.00	14.20	28.40	\$17,853.38
C. Create information		See 3B							
D. Gather existing information		See 3B							
E. Write report									
Notification of applicability	g	2	1	2	0.3	0.60	0.03	0.06	\$37.72
Notification of constr./reconstr.	h	2	1	2	0.3	0.60	0.03	0.06	\$37.72
Notification of anticipated startup	g	2	1	2	0.3	0.60	0.03	0.06	\$37.72

Burden item	Notes	(A) Person- hours per occurrence	(B) Number of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ ^a
Notification of actual startup	g	2	1	2	0.3	0.60	0.03	0.06	\$37.72
Notification of special compliance requirements	i	N/A							
Notification of performance test	d	2	1	2	0.3	0.60	0.03	0.06	\$37.72
Notification of compliance status	g	4	1	4	0.3	1.20	0.06	0.12	\$75.44
NESHAP waiver application	i	0	0	0	0	0.00	0.00	0.00	\$0.00
Report of performance test	d	See 3B							
Report of monitoring exceedances	j	16	2	32	14.26	456.32	22.82	45.63	\$28,686.10
Report of no excess emissions	j	8	2	16	57.04	912.64	45.63	91.26	\$57,372.04
Startup, shutdown, malfunction report	k	8	2	16	3.57	57.12	2.86	5.71	\$3,591.11
4. Recordkeeping Requirements									
A. Read instructions		See 3B							
B. Plan activities		N/A							
C. Implement activities		N/A							
D. Develop record system		N/A							
E. Time to enter information									
Records of all info. required by standards	l, m	3	52	156	71.3	11122.80	556.14	1112.28	\$669,223.70
F. Time to train personnel		4	1	4	0.3	1.20	0.06	0.12	\$75.44

Burden item	Notes	(A) Person- hours per occurrence	(B) Number of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) ^a Cost,\$
G. Time to adjust existing ways to comply with previously applicable requirements		N/A							
H. Time to transmit or disclose information	m	0.25	6 ³	0.75	71.3	53.50	2.68	5.35	\$3,363.22
I. Time for audits		N/A							
TOTAL BURDEN AND LABOR COST (HOURS)									\$1,372,289.00
									25103.92

^a Costs are from the United States Department of Commerce Bureau of Labor Statistics, March 2000, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation.": technical at \$55.37, management at \$78.54, and clerical at \$35.67.

^b The EPA Office of Air Quality Planning and Standards has indicated that there has been no significant change in this sector since the rule was promulgated. Therefore, we have assumed that there are 71 existing sources subject to the standard. This estimate is based on about 20 percent of the 86 (or 17) existing steel pickling facilities and acid regeneration plants at the time of rule development may be area sources that would not be subject to the standard. We have also that one new source at one facility would begin operation during the next 3-year period and would be required to comply with one-time only activities. Based on these assumptions, the average number of respondents per year for this ICR would be 71.3. For this ICR, we have further assume that all sources are in compliance with the existing rule requirements and none have requested a compliance extension.

^c Estimated hours for performance test and report by EPA Method 26A.

^d The new source will be required to conduct an initial performance test and we assume will not have to repeat it.

^e All existing sources (71) are required to conduct an annual performance test.

^f Assumes 10% of all existing sources (or 7.1) must write a revised maintenance plan.

^g The new source will be required to meet initial notifications requiremenets.

^h Assumes one reconstructed source at one facility over the 3-yr period, for 0.3 occurrences per respondent (1/3=0.3).

ⁱ Assumes no respondents will request a NESHAP waiver.

^j Assumes 20% of respondents (or 14.26) report excess emissions semiannually and the remaining 80 % (or 57.04 sources) report no excess emissions over the 3-year period.

^k Assumes 5% of respondents (or 3.57) will have a startup, shutdown, or malfunction event not managed according to the plan that requires a semiannual report.

^l Assumes 3 hours per respondent per week.

^m Assume that on average respondents transmits 3 reports per year (reports that may be transmitted include performance test reports, progress reports, semiannual reports, and immediate reports if corrective actions taken are different from the startup, shutdown and malfunction plan).

N/A = Not Applicable.

TABLE 2. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT ASSOCIATED FOR STEEL PICKLING NESHP

[illegible]

- ^a Costs are based on "OPM's 2002 General Schedule" hourly labor rates excluding locality pay: technical \$38.30, management at \$51.62, and clerical at \$20.72.
- ^b One new source over the 3-year period will perform an initial performance test.
- ^c Assume no new source will fail the initial performance test.
- ^d The EPA does not anticipate litigation of the proposed NESHAP.
- ^e Assume that 20% of respondents/yr or 14.26 are required to retest as a result of excess emissions.
- ^f Assume 1 new or reconstructed source over the 3-yr period ($1/3=0.3$).
- ^g Assume 80% of the respondents/yr or 57.04 report no excess emissions.
- ^h No NESHAP waivers are expected.
- ⁱ Assume 5% of respondents/yr or 3.57 will have a startup, shutdown, and malfunction event not managed according to the plan and will file semiannual reports.

